

DOCKET FILE COPY ORIGINAL

RECEIVED

JAN 15 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

ORIGINAL

In the Matter of)

Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the Telecommunications)
Act of 1996)

BellSouth Comparably Efficient)
Interconnection Plan for Payphone)
Service Providers)

CC Docket No. 96-128

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby files reply comments in support of the comments filed by the American Public Communications Council (APCC) concerning BellSouth Telecommunications, Inc.'s (BellSouth's) comparably efficient interconnection (CEI) plan for the provision of payphone service.

In its comments, APCC argues that BellSouth's plan concerning screening digits is discriminatory because LECs transmit a unique payphone screening digit-- "27"-- as part of automatic number identification (ANI) for their coin lines, however, the screening digit "07" is transmitted with other payphone lines and, to obtain specific payphone information, the interexchange carrier (IXC) must query the line information data base (LIDB). As alleged by

No. of Copies rec'd
List ABCDE

DJG

APCC, the provision of screening digits in this manner places non-LEC payphones in a discriminatory position with respect to LEC coin-line payphones in terms of the ease and cost associated with an IXC's ability to determine that a phone is a payphone. Since non-LEC payphones historically could not be coin-line phones, the result is that while BellSouth payphones transmit a specific payphone digit with ANI, the current base of non-BellSouth payphones cannot. Accordingly, BellSouth's CEI plan is discriminatory and should be rejected.

In addition, BellSouth's plan is not in compliance with the Commission's payphone orders. In the Order on Reconsideration, the Commission required local exchange carriers (LECs) to make available to payphone service providers (PSPs) coding digits as a part of ANI that specifically identify a phone as a payphone and "not merely a restricted line."¹ The Commission further required payphones to transmit the specific coding digits as a part of their ANI in order to be eligible for per-call compensation once it becomes effective.² Payphones that do not transmit the specific coding digits as a part of their ANI will not be eligible for per-call compensation.

The coding digit "07"--the digit BellSouth intends to provide as a part of ANI with payphones--is not a specific payphone digit. Rather, it merely indicates a restricted line, in direct violation of the Commission's on Reconsideration Order. Thus, PSPs purchasing payphone service from BellSouth will only be able to transmit the coding digit "07" and, therefore, they

¹ Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Order on Reconsideration, CC Docket No. 96-128, 91-35, FCC 96-439, at ¶ 64, released November 8, 1996.

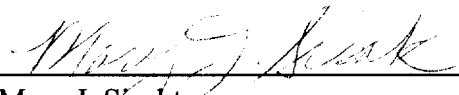
² Id.

will not be eligible for compensation. Accordingly, the Commission must require BellSouth to amend its CEI plan to demonstrate how it will provide a specific payphone coding digit for all payphone service as a part of ANI, and on the same terms and conditions as it provides "27" today for its coin-lines.³

Based on the foregoing, MCI respectfully requests that the Commission reject BellSouth's CEI plan and require BellSouth to refile it with the modifications specified herein.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By: 
Mary J. Sisak
Mary L. Brown
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2605

January 15, 1997

³ The coding digit "27" is provided at no additional charge to MCI.

CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that copies of the foregoing Reply Comments were sent via first class mail, postage paid to the following on the 15th day of January, 1997.

A. Kirven Gilbert III
BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

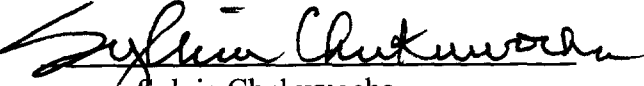
Ava B. Kleinman
AT&T Corp.
295 North Maple Avenue
Room 3252J1
Basking Ridge, NJ 07920

Albert H. Kramer
Robert F. Aldrich
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, N.W.
Washington, DC 20037-1526

John F. Beach
Beach Law Firm, P.A.
1400 Main Street, Suite 1207
Post Office Box 444
Columbia, SC 29202-0444

Danny E. Adams
Kelley Drye & Warren LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036

Janice Myles
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554


Sylvia Chukwuocha